

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Federal Insurance Co. v. al Qaida, 03 CV 06978 (RCC)

**AFFIRMATION OF SEAN P. CARTER IN OPPOSITION TO
SAUDI AMERICAN BANK'S MOTION TO DISMISS**

Sean P. Carter, Esq., affirms as follows:

1. I am an attorney admitted to practice *pro hac vice* in the above-captioned matter, and a member of the law firm Cozen O'Connor. I submit this Affirmation to transmit to the Court the following documents submitted in opposition to the Motion to Dismiss filed by Defendant, Saudi American Bank.

2. Exhibit 1 to this Affirmation is a true and accurate copy of a section of the United States Department of State's report entitled "*Patterns of Global Terrorism: 1997, Overview of State-Sponsored Terrorism*" (April 1998), which is available at <http://www.usemb.se/terror/rpt1997/sponsored.html>.

3. Exhibit 2 to this Affirmation is a true and accurate copy of a United States Defense Department fact sheet entitled "*Defense Department Fact Sheet on Usama Bin Ladin: Saudi Advocates Destruction of United States*" (August 20, 1998), which is available at <http://usembassy-australia.state.gov/hyper/WF980820/epf404.htm>.

4. Exhibit 3 to this Affirmation is a true and accurate copy of the chronology of Osama bin Laden's political life from the online companion to the PBS FRONTLINE report entitled "*Hunting Bin Laden, Osama Bin Laden: A Chronology of His Political Life*" (PBS

television & PBS online, published April 1999 & updated Sept. 2001), which is available at <http://www.pbs.org/wgbh/pages/frontline/shows/binladen/etc/cron.html>.

5. Exhibit 4 to this Affirmation is a true and accurate copy of a Congressional Research Service report entitled “*Terrorism: Near Eastern Groups and State Sponsors 2002*” (updated February 13, 2002), which is available at <http://www.lib.uiowa.edu/govpubs/guides/terrorism.html>.

6. Exhibit 5 to this Affirmation is a true and accurate copy of the unclassified version of Director of Central Intelligence George C. Tenet’s testimony before the Joint Inquiry into Terrorist Attacks against the United States (June 18, 2002), which is available at http://www.cia.gov/cia/public_affairs/speeches/2002/dci_testimony_06182002.html.

7. Exhibit 6 to this Affirmation is a true and accurate copy of the press release from the United States Attorney for the Southern District of New York announcing the indictment of Osama bin Laden and Muhammad Atef for the August 7, 1998, bombings of the U.S. embassies in Nairobi, Kenya, and Dar es Salaam, Tanzania (November 4, 1998), which is available at http://fas.org/irp/news/1998/11/98110602_nlt.html.

8. Exhibit 7 to this Affirmation is a true and accurate copy of a section of the United States Department of State’s report entitled “*Patterns of Global Terrorism: 1993, State-Sponsored Terrorism Overview*” (April 1994), which is available at http://www.fas.org/irp/threat/terror_93/statespon.html.

9. Exhibit 8 to this Affirmation is a true and accurate copy of a 1996 CIA Assessment of Osama bin Laden entitled “*Usama Bin Laden: Islamic Extremist Financier*” (August 1996), which is available at <http://www.gwu.edu/~nsarchiv/NSAEBB/NSAEBB55/ciaubl.pdf>.

10. Exhibit 9 to this Affirmation is a true and accurate copy of a section of the United States Department of State's report entitled "*Patterns of Global Terrorism: 1995, Overview of State-Sponsored Terrorism*" (April 1996), which is available at <http://www.usemb.se/terror/rpt1995/sponsor.html>.

Affirmed in Philadelphia, Pennsylvania on October 26, 2004.

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Sean P. Carter